

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

COBIE JONES,

*Plaintiff,*

-VS-

CITY OF CHICAGO, CHICAGO

POLICE OFFICERS STEC #1980,

SMITH #12935, F. SNYDER,

T. DAVEY #3361, P. ARPAIS #15120,

**B. GRISUTH #7575, EVANGELIDES #6390,**

DiFRANCO #19312, JOLIFF-BLAKE #5240,

J. DVORATCHEK #7463, Y. TALLEY #4156,

J. DVOREN #19446, J. ECHOLS #12329,

D. DELPILAR #14995, and W. SMITH, #20297,

*Defendants.*

No. 09 CV \_\_\_\_\_

*(jury demand)*

FILED: FEBRUARY 18, 2009

09CV1059

**JUDGE DOW**

MAGISTRATE JUDGE DENLOW

**AEE**

# COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1343 and 28 U.S.C. §1367.
2. Plaintiff Cobie Jones is a resident of the Northern District of Illinois.
3. Defendants STEC #1980, SMITH #12935, F. SNYDER, T. DAVEY #3361, P. ARPAIS #15120, B. GRISUTH #7575, EVANGELIDES #6390, DiFRANCO #19312, JOLIFF-BLAKE #5240, J. DVORATCHEK #7463, Y. TALLEY #4156, J. DVOREN #19446, J. ECHOLS #12329, D. DELPILAR #14995, and W. SMITH, #20297 (hereinafter "police officer defendants"), were at all times relevant acting under color of their authority as police officers of the City of Chicago; each is sued in his (or her) individual capacity.

4. Defendant City of Chicago is an Illinois municipal corporation joined in this action pursuant to 28 U.S.C. §1367.
5. On May 17, 2007 plaintiff was arrested on a warrant and charged with an offense.
6. One or more of the "police officer defendants" caused the issuance of the above referred warrant.
7. The officers who secured issuance of the above referred warrant did not have a reasonable basis to believe that plaintiff had committed an offense.
8. One or more of the "police officer defendants" caused plaintiff to be charged an offense.
9. As a result of the above described wrongdoing, plaintiff remained in custody until on or about September 29, 2008 when all charges against him were dismissed in a manner consistent with his innocence.
10. The above described actions of one or more of the police officer defendants caused plaintiff to be deprived of rights secured by the Fourth and Fourteenth Amendments to the Constitution of the United States and to have been subjected to the Illinois tort of malicious prosecution.
11. As a result of defendants' wrongful acts, plaintiff lost his job, suffered irreparable injury to close personal relationships, and was deprived of his liberty for about seventeen months.
12. Plaintiff demands trial by jury.

WHEREFORE plaintiff prays that judgment be entered against defendants jointly and severally in an amount in excess of five hundred thousand dollars as compensatory damages.

/s/ Kenneth N. Flaxman

KENNETH N. FLAXMAN

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